U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
MAR - 9 2017
CLERK, U.S. DISTRICT COURT
By ________
Deputy

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JOHNNY FLORES (01)
CHRISTOPHER LOUIS CONDE (02)

Case No: 4:17-MJ-277

CRIMINAL COMPLAINT

I, Kevin K. Brown, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Conspiracy to Possess a Controlled Substance with Intent to Distribute

Beginning sometime before April 2015, and continuing thereafter until March 9, 2017, in the Fort Worth Division of the Northern District of Texas, defendants **Johnny Flores** and **Christopher Louis Conde**, and others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, in violation of 21 U.S.C. § 846.

I am a Task Force Officer with the Drug Enforcement Administration and this Complaint is based on the following facts:

1. In 2016, Members of the Texas Department of Public Safety and Drug Enforcement Administration identified several large suppliers of methamphetamine in the Young County, Texas, area. During the investigation, Investigators were able to identify Johnny Flores as a source of the methamphetamine from the Fort Worth, Texas area.

With the use of confidential informant (CI), plans were made to have Johnny Flores arrange a delivery of methamphetamine to the CI.

2. On March 2, 2017, the CI began a text conversation with Flores. After numerous texts exchanges between the CI and Flores, it was decided that the CI would meet one of Flores's runners in Jacksboro, Texas. The CI advised that Flores's nephew usually delivered. Surveillance was established in Jacksboro. Investigators searched the CI and his/her vehicle for any illegal contra-band; none was found.

3. On this same date, at approximately 7:00 p.m., the CI arrived at the parking lot of the Lowes grocery store in Jacksboro. At approximately 7:33 p.m., a silver, Kia Soul, driven by an individual who later identified as Christopher Conde, arrived at the parking lot and met with the CI. The meeting lasted approximately two minutes, and then Conde departed.

4. At approximately 7:40 p.m., a Jacksboro Police Sargent conducted a traffic stop on Conde identified the driver as Christopher Conde. The Sargent identified the subject by word of mouth because Conde did not have identifying paperwork.

5. As the traffic stop was being conducted, surveillance was maintained on the CI until she met other investigators at a predetermined location. Once at the location, the CI turned over the package Conde delivered. The CI was again searched for any illegal contra-band; none was found. Investigators opened the package and found approximately seven ounces of methamphetamine.

6. A field test was conducted on a small sample of the crystal-like substance. It tested positive for methamphetamine. The methamphetamine was submitted to the DEA South Central laboratory for analysis, storage, and safekeeping.

7. Since the delivery of the methamphetamine, Flores has had numerous text exchanges with the CI. Flores intends to meet with the CI on Friday, March 10, 2017, to retrieve the money for the previously-supplied methamphetamine.

8. Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated above establish probable cause that the above-named defendants have violated 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).

Kevin K. Brown, Affiant
DEA - Task Force Officer

Sworn to before me, and subscribed in my presence on March 9, 2017 at 2:40 p.m., in Fort Worth, Texas.

JEFFREY L. CURETON
United States Magistrate Judge